

LEAF LEGAL, P.C.

— Attorneys at Law —

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December 20, 2023

Honorable Judge Denise Cote
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Granted.
Denise Cote
12/21/23

RE: Tereshchenko v. Karimi
Case No: 23-cv-2006

Dear Judge Cote,

In response to the Court's directive upon our joint motion seeking permission for remote testimony of foreign witnesses dated December 19, 2023, we submit the following list of witnesses the defense intends to call at trial:

1. Afonin Dmytro Serhiiovych¹ – Forensic Expert in Video Surveillance Recordings
(Affidavit to be provided as exhibit).
2. Elizabeth McShow Baraya² – Yasamin Karimi's Childhood Friend (Affidavit to be provided as exhibit).
3. Alexander Savostin³ – Expert Forensic Psychologist from Ukraine (Affidavit to be provided as exhibit).

¹ Requesting appearance via video because of legal impediment to travel from the Ukraine.

² Requesting appearance via video because of legal impediment to travel with Ukrainian passport.

³ Requesting appearance via video because of legal impediment to travel from the Ukraine.

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4. Ekaterina Malichenko⁴ – Ukrainian Attorney Representing Respondent in Custody and Appeal and Expert in Ukrainian Law (Affidavit to be provided as exhibit).

Opposing counsel has consented to the foregoing. Thank you for your consideration of this issue.

Respectfully Submitted,

_____/s/_____
Stephanie R. Schuman, Esq.

⁴ Requesting appearance via video because of legal impediment to travel from the Ukraine.